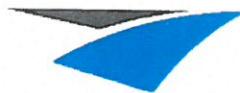


DAUGHERTY v. EQUIFAX INFORMATION SERVICES

WITNESS: DAVID M. DAUGHERTY

DATE: JUNE 17, 2015

EXHIBITS 1, 4-8, 11



**VERITEXT LEGAL SOLUTIONS
330 OLD COUNTRY ROAD, SUITE 300
MINEOLA, NY 11501**

**1250 BROADWAY, SUITE 2400
NEW YORK, NY 10001
800-727-6396**

IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA
DAVID M. DAUGHERTY,

Plaintiff,
v.
CIVIL ACTION NO. 14-C-699-K

EQUIFAX INFORMATION
SERVICES, LLC, and OCWEN
LOAN SERVICING, LLC,

Defendants.

COMPLAINT

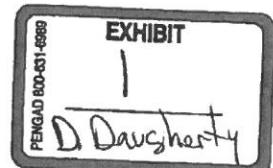
1. After Plaintiff David M. Daugherty applied to refinance his mortgage loan in order to make a scheduled balloon payment, Defendants Equifax Information Services, LLC, and Ocwen Loan Servicing, LLC, continued to report that he was seriously delinquent on his mortgage loan. Plaintiff brings this action for actual, statutory, and punitive damages, costs and attorney's fees, pursuant to 15 U.S.C. § 1681, *et seq.* (Federal Fair Credit Reporting Act) and for other relief under the West Virginia Consumer Credit and Protection Act.

PARTIES

2. Plaintiff David M. Daugherty is a West Virginia resident. He is a "consumer" as defined by 15 U.S.C. § 1681a(c) and by *West Virginia Code 46A-2-122*.

3. (a) Defendant Equifax Information Services, LLC ("Equifax"), is a Georgia limited liability company registered to do business in West Virginia with its principal office address in Georgia.

(b) Upon information and belief, Equifax is a "consumer reporting agency," as defined in 15 U.S.C. § 1681a(f). Upon information and belief, Equifax is regularly engaged in the business of assembling, evaluating, and disbursing information concerning consumers for the



purpose of furnishing consumer reports, as defined in 15 U.S.C. § 1681a(d), to third parties.

(c) Upon information and belief, Equifax disburses such consumer reports to third parties under contract for monetary compensation.

4. Defendant Ocwen Loan Servicing, LLC, ("Ocwen") is a Delaware limited liability company registered to do business in West Virginia with a principal office in West Palm Beach, Florida.

STATEMENT OF FACTS

Loan

5. Plaintiff David M. Daugherty has a mortgage loan that matures in July 2014 with a balloon payment due at that time in the amount of approximately \$80,000.00.

6. Ocwen is the servicer of Plaintiff's mortgage loan.

7. While seeking to refinance his mortgage to avoid the balloon payment, Plaintiff encountered problems securing a new loan due to his credit. Plaintiff investigated and obtained a credit report in January 2014.

8. Plaintiff discovered that Ocwen had reported to Equifax his loan as 120 days delinquent in March 2013, June 2013, July 2013, October 2013, December 2013, and January 2014.

9. Plaintiff also discovered that Ocwen reported to Equifax that he had a past due balance of \$6,128.00.

10. Plaintiff disputed the reported delinquencies, and on March 14, 2014, Plaintiff's Equifax noted on his credit report that "Consumer disputes - reinvestigation in progress."

11. On March 17, 2014, Plaintiff disputed the reports in a letter to Ocwen.

12. On March 17, 2014, Plaintiff explicitly disputed Ocwen's delinquency in a letter to Equifax.

13. Equifax never responded to this dispute.
14. Plaintiff retained the services of a credit repair company, who disputed Plaintiff's reported delinquencies on his behalf to each of the major credit reporting bureaus.
15. On March 24, 2014, Equifax responded to Plaintiff's credit repair company's dispute by noting, "[w]e have researched the credit account. Account # 709224*. The results are: We verified this item belongs to you. If you have additional questions about this item please contact: Ocwen..."
16. Equifax continued to report the Plaintiff's mortgage loan delinquent, noting "foreclosure process started."
17. Plaintiff was 30 days late in his payment to Ocwen in March 2013. Ever since, Plaintiff has made timely payments to Ocwen.
18. Plaintiff does not owe any arrearages to Ocwen.
19. Despite his disputes to Equifax and to Ocwen, Equifax continues to list negative reports to Plaintiff's account with Ocwen, as recently as May 1, 2014.
20. As a result of Defendants' conduct, Plaintiff has been unable to refinance his mortgage and faces the prospect that he will lose his home when he is unable to make a balloon payment.
21. As a result of Defendants' conduct, Plaintiff suffered loss of credit; loss of the ability to purchase and benefit from credit; increased insurance rates; increased interest rates; and the mental and emotional pain, anguish, humiliation, and embarrassment of credit denials.

COUNT I - FAILURE TO REINVESTIGATE

22. Plaintiff incorporates all of the preceding paragraphs by reference.
23. Defendant Equifax failed to conduct a reasonable reinvestigation of the information

in Plaintiff's credit file after receiving actual notice of inaccuracies; failed to delete inaccurate information upon actual notice of inaccuracies; failed to maintain reasonable procedures with which to filter and verify disputed information in Plaintiff's credit file; and relied upon verification from a source it has reason to know is unreliable, in violation of 15 U.S.C. § 1681i.

24. Defendant's conduct, action, and inaction was willful, or, in the alternative, negligent.
25. Plaintiff was harmed by Defendant's conduct, action, and inaction.

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) Appropriate statutory penalties for each violation of the FCRA;
- (b) Actual damages;
- (c) Punitive damages;
- (d) Reasonable attorney's fees and the costs of this litigation;
- (e) Pre-judgment and post-judgment interest at the legal rate;
- (f) Appropriate equitable relief, including the correction of Plaintiff's credit score; and
- (g) Such other relief as the Court deems equitable, just, and proper.

COUNT II - FAILURE TO ASSURE ACCURACY

26. Plaintiff incorporates all of the preceding paragraphs by reference.
27. Defendant Equifax failed to establish or follow reasonable procedures to assure maximum possible accuracy in the preparation of the credit report and credit files maintained and published concerning Plaintiff, in violation of 15 U.S.C. § 1681e(b).
28. Defendant's conduct, action, and inaction was willful, or, in the alternative, negligent.
29. Plaintiff was harmed by Defendant's conduct, action, and inaction.

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) Appropriate statutory penalties for each violation of the FCRA;
- (b) Actual damages;
- (c) Punitive damages;
- (d) Reasonable attorney's fees and the costs of this litigation;
- (e) Pre-judgment and post-judgment interest at the legal rate;
- (f) Appropriate equitable relief, including the correction of Plaintiff's credit score; and
- (g) Such other relief as the Court deems equitable, just, and proper.

COUNT III - REPORTING INFORMATION WHICH IT CANNOT VERIFY

- 30. Plaintiff incorporates all of the preceding paragraphs by reference.
- 31. Defendant Equifax failed to delete the negative reports regarding Plaintiff's mortgage loan from the credit report and credit files maintained and published concerning Plaintiff after a reinvestigation would have found the mortgage loan to be current, in violation of 15 U.S.C. § 1681i(a)(5).
- 32. Defendant's conduct, action, and inaction was willful, or, in the alternative, negligent.
- 33. Plaintiff was harmed by Defendant's conduct, action, and inaction.

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) Appropriate statutory penalties for each violation of the FCRA;
- (b) Actual damages;
- (c) Punitive damages;
- (d) Reasonable attorney's fees and the costs of this litigation;
- (e) Pre-judgment and post-judgment interest at the legal rate;
- (f) Appropriate equitable relief, including the correction of Plaintiff's credit

score; and

(g) Such other relief as the Court deems equitable, just, and proper.

COUNT IV: FAILURE TO INVESTIGATE (OCWEN)

34. Plaintiff realleges and incorporates paragraphs 1 through 29 above as if fully set out herein.

35. On one or more occasions within the two years prior to the filing of this suit, by example only and without limitation, Ocwen violated the Fair Credit Reporting Act, 15 U.S.C. §1681s-2(b)(1)(A) by failing to fully and properly investigate the Plaintiff's disputes of the representations.

36. As a result of this conduct, action and inaction of Ocwen, the Plaintiff suffered actual damages including without limitation, by example only and as described herein on Plaintiff's behalf by counsel: loss of credit, damage to reputation, embarrassment, humiliation and other emotional and mental distress.

37. Ocwen's conduct, action and inactions were willful, rendering Ocwen liable for punitive damages in an amount to be determined by the Court pursuant to 15 U.S.C. §1681n. In the alternative, Ocwen was negligent, entitling the Plaintiff to recover under 15 U.S.C. §1681o.

38. The Plaintiff is entitled to recover actual damages, statutory damages, costs and attorneys fees from Ocwen in an amount to be determined by the Court pursuant to 15 U.S.C. §1681n and §1681o.

COUNT V – ILLEGAL DEBT COLLECTION (OCWEN)

39. The Plaintiff incorporates by reference the preceding paragraphs.

40. The Defendant Ocwen Loan Servicing in attempting to collect a debt or obtain information on numerous occasions misrepresented the amounts due against the Plaintiff in violation of *West Virginia Code* section 46A-2-127(d).

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) Actual damages;
- (b) Civil penalties of \$4,600 for each violation pursuant to *West Virginia Code* sections 46A-5-101(1) & 106.
- (c) Reasonable attorneys fees and the costs of this litigation; and
- (d) Such other relief as the Court deems equitable and just.

COUNT VI - NEGLIGENCE

41. Plaintiff incorporates the preceding paragraphs by reference.

42. Under the circumstances alleged, in which Defendants engaged in significant communications and activities with Plaintiff and the loan thereby creating a special relationship with Plaintiff, Defendants owed a duty to Plaintiff to provide him with accurate information about his loan account and its obligations and rights thereunder.

43. Defendants breached that duty by refusing to respond to Plaintiff's inquiries, by acknowledging the blatant inaccuracies contained in Plaintiff's credit report but refusing to redress the inaccuracies, advising Plaintiff to contact the other Defendant instead of taking steps to address the issue, and ultimately denying Plaintiff assistance.

44. Plaintiff was damaged by Defendants' misconduct by the severely negative credit reporting that made it impossible for Plaintiff to refinance his loan.

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) Appropriate equitable relief;

- (b) Actual damages;
- (c) Reasonable attorney's fees and the cost of this litigation; and
- (d) Such other relief the Court deems equitable and just.

COUNT VII – TORT OF OUTRAGE

45. Plaintiff incorporates the preceding paragraphs by reference.
46. Defendant's conduct, namely, repeatedly misstating the amounts due, reporting gross inaccuracies when Plaintiff's account was current to credit bureaus, refusing to assist Plaintiff to rectify the gross inaccuracies, and preventing Plaintiff from protecting his home from foreclosure when his account was current, was atrocious, intolerable, and exceeded the bounds of decency.
47. Defendants were substantially certain that emotional distress would follow from their conduct.
48. Defendants' actions caused Plaintiff to suffer severe emotional distress.

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) Appropriate equitable relief;
- (b) Actual and punitive damages;
- (c) Reasonable attorney's fees and the cost of this litigation; and
- (d) Such other relief the Court deems equitable and just.

COUNT VIII - EQUITY ABHORS A FORFEITURE

49. Plaintiff incorporates the preceding paragraphs by reference.
50. Defendants have and have had the ability to correct Plaintiff's credit inaccuracies and allow Plaintiff the opportunity to refinance and protect his home.
51. Defendants are seeking forfeiture of his equity in his home.

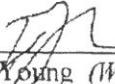
52. Defendants have refused to exercise due diligence and good faith to correct the gross inaccuracies in Plaintiff's credit report, and instead have wrongfully reported Plaintiff's credit scores so egregiously that he cannot obtain credit to refinance his home elsewhere and will certainly lose his home.

WHEREFORE, Plaintiff respectfully requests the following relief:

- (a) Appropriate equitable relief;
- (b) Such other relief as the Court deems equitable and just.

PLAINTIFF DEMANDS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Plaintiff,
DAVID M. DAUGHERTY

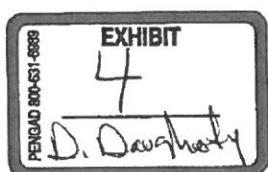

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Hamilton, Burgess, Young & Pollard, PLLC
Counsel for Plaintiff
P O Box 959
Fayetteville, WV 25840
304-574-2727

TRADE

AUTOMATED CONSUMER DISPUTE VERIFICATION

EQUIFAX CREDIT INFORMATION
SERVICES

Control Number	99993121006543102	Dispute ID	[001] NOT HIS/HERS. PROVIDE COMPLETE ID
Origin NCRN EFX	Bureau Code	9999	
Date Created	05/31/2013	Response Due	06/22/2013
Subscriber Code	4652FS01690	Dispute 2	
Account Number	1093244537	FCRA Relevant Information	
Grantor Name	Ocwen Loan Servicing, LLC		
Responder Name	Daniel John		
Responder Phone	561-682-7675	Response Date	06/02/2013
Response Code	<input checked="" type="checkbox"/> Verified As Reported <input type="checkbox"/> Modify As Shown <input type="checkbox"/> Delete Account <input type="checkbox"/> Delete Fraud		
Reported Consumer Identity			
Name	DAUGHERTY DAVID MAX	Same	Modified Consumer Identity
AKA/FN		<input checked="" type="checkbox"/>	Name
Aacr	35 VALLEY VIEW DR 35, VIENNA, WV 26105	<input type="checkbox"/>	AKA/FN
Pref	PO BOX 816, PARKERSBURG, WV 26102	<input type="checkbox"/>	Address
SSN	232-04-9020	<input type="checkbox"/>	35 VALLEY VIEW DR., VIENNA, WV 26105
DOB	12/14/1957	<input type="checkbox"/>	SSN
Phone	304-295-6161	<input type="checkbox"/>	232-04-9020
		<input type="checkbox"/>	DOB
		<input type="checkbox"/>	Phone



EIS-DAUGHERTY-000060

Account Type	ECOA	Type & Rating	[271]
26	I	07/1999	M-
CreditLimit	High Credit	CurrentBalance	Past Due
		\$8311	\$100860
Original Charge Off	Date 1st Delinquency	Last Payment Date	Date Closed
		01/2013	
Activity Designator		Crediton Classification	
[1] Invalid activity design	'1'		
Term Duration	Term Frequency	Sched Monthly Pmt	Actual Payment
30	[3] Monthly	\$980	\$980
Date of Account Info	Pmt Hist Months 1-12	Pmt Hist Months 13-24	Pmt Hist Months 25-35
01/2013	-D000000010	4323B-----	Pmt Hist Months 37-48
Consumer Info Indicator		Pmt Hist Months 49-60	Pmt Hist Months 61-72
Compliance Condition Code		Pmt Hist Months 73-84	Pmt Hist Months 85-96
Special Condition Code			
Account Status	[11] Current account		
Payment Rating	[0] Current account		

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EQUIFAX CREDIT INFORMATION
SERVICES

IMAGES SENT	
No Images	Sent

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EIS-DAUGHERTY-000061

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EQUIFAX CREDIT INFORMATION SERVICES

Control Number	99993151006543103	Bureau Code	9999	Dispute 1	[001] NOT HIS/HERS. PROVIDE COMPLETE ID
Originator	EFX	Date Created	05/31/2013	Response Due	05/22/2013
Subscriber Code	465PS01690	Account Number	7092244537	Dispute 2	
Grantor Name	Ocwen Loan Servicing, LLC	Responder Name	Daniel John	FCRA Relevant Information	
Responde Phone	561-682-7675	Response Date	06/02/2013	<input checked="" type="checkbox"/> Verified As Reported	<input type="checkbox"/> Notify As Shown
Response Code				<input type="checkbox"/> Delete Account	<input type="checkbox"/> Delete Fraud

Reported Consumer Identity			Same	Modified Consumer Identity	
Name	DAUGHERTY DAVID MAX	AKA/FN	<input checked="" type="checkbox"/>	Name	DAUGHERTY DAVID
Addr	35 VALLEY VIEW DR 35, VIENNA, WV 26105	PO	<input type="checkbox"/>	AKA/FN	35 VALLEY VIEW DR, VIENNA, WV 26105
Prev	PO BOX 816, PARKERSBURG, WV 26102	SSN	<input type="checkbox"/>	Alt	35 VALLEY VIEW DR, VIENNA, WV 26105
DOB	233-04-9020	DOB	<input checked="" type="checkbox"/>	Prev	233-04-9020
Phone	304-295-6161	Phone	<input type="checkbox"/>	STI	233-04-9020
			<input type="checkbox"/>	DOB	
			<input type="checkbox"/>	Phone	

Account Type	ECOA	Date Open	Type & Rate	Narratives	
OB	I	08/1/1999	MC	<input type="checkbox"/> [451] <input type="checkbox"/> [272]	
Credit Limit	High Credit	Current Balance	Post Due		
	\$100813	\$85639	\$6128		
Original Charge-Off	Date 1st Delinquency	Last Payment Date	Date Closed		
	10/2011	01/2012			
Activity/Designator					
[2] Invalid activity/design: '2'					
Creditor Classification					
Purchased/Sold To Name / Original Creditor					
Purchase Indicator					
Mortgage Id Number					
Term Duration	Term Frequency	Sched Monthl Pmt	Actual Payment	Deferred Pay Start Date	Balance Payment
30	[M] Monthly	\$1077	\$200		Realign Pay Due Date
Date of Account Orig.	Prin Hist Months 1-12	Prin Hist Months 13-24	Prin Hist Months 25-36	Prin Hist Months 37-48	Prin Hist Months 49-60
03/7/2013	--DDDDDDDDDD	D323B-----	-----	-----	Prin Hist Months 61-72
ConsumerInfo Indicator					
Compliance Condition Code					
Special Comment Code	[BO] Foreclosure proceedings started				
Account Status	[82] Account 120 days past the due date				
Payment Rating					

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EQUIFAX CREDIT INFORMATION SERVICES

<input checked="" type="checkbox"/> Control Number 99993184007034103		<input type="checkbox"/> NOT HIS/HERS.		PROVIDE COMPLETE ID	
Originating EPK	Bureau Code 9999	Response Due 07/24/2013	Dispute 2		
Date Created 07/03/2013	Response Due 07/24/2013				
Subscriber Code 465FS021690					
Account Number 7092244537					
FCRA Relevant Information					
Grilio: Name Ocwen Loan Servicing, LLC					
Responder Name Raj Kumar					
Responder Phone 561-682-7675	Response Date 07/05/2013				
Response Code <input checked="" type="checkbox"/> Verified As Reported	<input type="checkbox"/> Verify As Shown	<input type="checkbox"/> Delete Account	<input type="checkbox"/> Delete Fraud		
Reported Consumer Identity					
Name DAUGHERTY DAVID MAX	Same				
AKA/FN	<input checked="" type="checkbox"/> Name DAUGHERTY DAVID				
Address 35 VALLEY VIEW DR 35, VIENNA, WV 26105	<input type="checkbox"/> AKA/FN				
Prev PO BOX 8116, PARKERSBURG, WV 26102	<input type="checkbox"/> Addr				
SSN 232-04-9020	<input type="checkbox"/> Prev				
DOB 12/14/1957	<input type="checkbox"/> SSN				
Phone 304-295-6161	<input type="checkbox"/> DOB				
	<input type="checkbox"/> Phone				
	<input type="checkbox"/> 304-295-6161				
Narratives					
Account Type EODA	Date Open	Type & Rate			
08	I 08/1999	N- [451]			
		[272]			
Credit Limit	High Credit	Current Balance	Past Due		
		\$100813	\$85639		
Original Charge-Off	Date 1st Delinquency	Last Payment Date	Date Closed		
	10/2011	01/2012			
Activity Descriptor					
[2] Invalid activity, design '2'					
Creditor Classification					
Purchased/Sold To Name / Original Creditor					
Purchase Indicator					
Mortgage ID Number					
Terms Duration	Term Frequency	Sched Monthly Pmt	Actual Payment	Deferred Pay Start Date	Balloon Pay Date
3.0	<input checked="" type="checkbox"/> Monthly	\$1077	\$200		
Date of Account Info	Pmt Hist Months 1-12	Pmt Hist Months 13-24	Pmt Hist Months 25-36	Pmt Hist Months 37-48	Pmt Hist Months 49-54
07/2013	-DDADDDDDDD	DDDD323B	-----	-----	-----
Consumer Info/Indicator					
Compliance Condition Code					
Special Comment Code: [BO] Foreclosure proceedings started					
Account Status <input checked="" type="checkbox"/> Account 120 days past the due date					
Payment Rating					



EIS-DAUGHERTY-000089

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EQUIFAX CREDIT INFORMATION SERVICES

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Page 2

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EQUIFAX CREDIT INFORMATION SERVICES

Control Number: 99993184007034101		Bureau Code: 99999	Dispute 1 [001] NOT HIS/HERS - PROVIDE COMPLETE ID	
Originating BPK	Date Created: 07/03/2013	Response Due: 07/24/2013	<input type="checkbox"/> Dispute 2	
Subscriber Code: 605FADS0178	Account Number: 12907408	FCRA Relevant Information		
Grantor Name: Ocwen Loan Servicing, LLC				
Responder Name: Shalini Singh	Response Date: 07/09/2013			
Responder Phone: 561-682-7675	<input checked="" type="checkbox"/> Verified As Reported	<input type="checkbox"/> Modify As Shown	<input type="checkbox"/> Delete Account	<input type="checkbox"/> Delete Fraud
Reported Consumer Identity				
Same Name DAUGHERTY DAVID MAX				
AK/NFN				
Add'l 35 VALLEY VIEW DR 35, VIENNA, WV 26105				
Prev PO BOX 816, PARKERSBURG, WV 26102				
SEN 232-04-9020				
DCB 12/14/1957				
Phone 304-295-6161				
Account Type: ECOA		Date Open: 08/1999	Type & Rate: <input type="checkbox"/> PAID BY DEALER	Narratives:
Q8		J	MT	[231] PAID BY DEALER
Credit Limit: \$100813		High Credit	Current Balance: \$0	Past Due:
Original Charge Off: 09/2011		Date 1st Delinquency:	Last Payment Date: 09/2011	Date Closed:
Activity Designator: [1] Invalid activity_design_1'		Creditor Classification:	Purchased/Sold To Name / Original Creditor:	Purchase Indicator:
Term Duration: 15		Term Frequency: [M] Monthly	Sched Monthly Pmt: \$1077	Actual Payment:
Date of Account Info: 09/2011		Pmt Hist Months: 1-12	Pmt Hist Months: 25-56	Pmt Hist Months: 49-60
		-DDEDDEDDED	000000322110	112121100000
Consumer Info Indicator:				D11DDDB322211
Compliance Condition Code:				1111DD1211B---
Special Comment Code: [0] Account transferred to another lender				
Account Status: [11] Current account				
Payment Rating: [0] Current account				

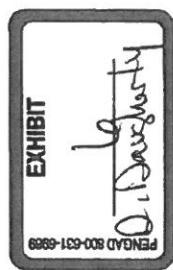
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Page 7

EXHIBIT

PENGUIN 800-631-6999



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EIS-DAUGHERTY-000096

CRA Data List of Loan Number: 70922446537																
Acct Number	Loan Number	Billing Date	Boled Date	Recorded	Consumer Name	Social Sec No	Street	Address 1	Address 2	City	State Zip	Last Name	Account	Program	Special	Comments
1	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
2	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
3	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
4	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
5	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
6	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
7	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
8	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
9	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
10	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
11	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
12	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
13	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
14	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
15	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
16	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
17	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
18	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
19	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
20	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				
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34	70922446537	53170214	53170214	0	David Daugherty	111-9620	35 Valley View Cr	WV	26105	Charleston	WV	11				

EXHIBIT
J
D. Daugherty
PENGARD 800-631-6969

CONFIDENTIAL

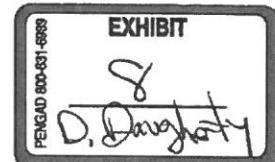
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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

DAVID M. DAUGHERTY, PLAINTIFF
V. CIVIL ACTION NO. 5:14-24506
EQUIFAX INFORMATION SERVICES
LLC and DEFENDANTS
OCWEN LOAN SERVICING, LLC,

PLAINTIFF'S RULE 26(a)(2) DISCLOSURE

Comes now the Plaintiff, David Daugherty, by counsel, pursuant to Rule 26(a)(2) of the *Federal Rules of Civil Procedure*, and files this Expert Witness Disclosure. Plaintiff discloses that he will identify Evan Hendricks for use at trial to present evidence. Attached to this disclosure is Mr. Hendricks' curriculum vitae, which includes his qualifications, including a list of all publications authored; a list of all other cases in which he testified as an expert at trial or by deposition; and a statement of his compensation to be paid for the study and testimony in this case. Mr. Hendricks has also supplied a report with all opinions he will express based upon the facts available to him at this date. Plaintiff will supplement this disclosure, pursuant to Rule 26(a)(2)(E) of the *Federal Rules of Civil Procedure*, with a complete statement of all opinions Mr. Hendricks will express and the facts and data he considered to form such opinions as soon as Plaintiff receives sufficient discovery responses to inform Mr. Hendricks' opinions from Defendants.



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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

DAVID M. DAUGHERTY,

PLAINTIFF

v.

CIVIL ACTION NO. 5:14-24506

EQUIFAX INFORMATION SERVICES LLC
and OCWEN LOAN SERVICING, LLC,

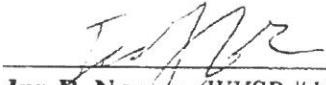
DEFENDANTS

CERTIFICATE OF SERVICE

I, Jed R. Nolan, counsel for Plaintiff, hereby certify that I have filed this **CERTIFICATE OF SERVICE** for **PLAINTIFF'S RULE 26(a)(2) DISCLOSURE** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants, and that I served a true and accurate copy of the entire document via electronic mail and via United States mail, postage prepaid, to each of the following on April 3, 2015:

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